

# Federal Defenders OF NEW YORK, INC.

Southern District  
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February 26, 2008

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JUDGE SCHEINDLIN  
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The Honorable Shira A. Scheindlin, U.S. District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: United States v. Alexander Concepcion, 07 Cr. 1095 (SAS)

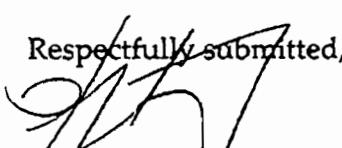
Dear Judge Scheindlin:

I write to request a 30-day adjournment of Alexander Concepcion's pre-trial motions filing deadline, currently scheduled for February 29, 2008. Mr. Concepcion is charged in a one-count indictment with conspiracy to distribute over fifty (50) grams of cocaine-base. He is currently incarcerated at the Metropolitan Detention Center (MDC).

The Government timely provided discovery on January 31, 2008. Included in the discovery are several compact discs containing thousands of monitored telephone calls allegedly made by Mr. Concepcion to co-conspirators. I am in the process of reviewing the discovery, conducting necessary investigation, and researching potential pre-trial motions. Due to the volume of the discovery, I require additional time to research and prepare pre-trial motions.

I anticipate that an adjournment of thirty (30) days will be sufficient to allow me to continue to review the discovery and prepare necessary pre-trial motions. Counsel for the Government consents to this request.

Respectfully submitted,

  
Hugh M. Mundy  
Attorney for Mr. Concepcion  
(212) 417-8737

cc: Assistant U.S. Attorney John Zach

Defendant's request for a 30-day adjournment to file motions is granted. Any motion by defendant must be made by March 28, 2008. Time excluded until March 28, 2008. So Ordered: Shaffer USDJ 2/26/08

TOTAL P.002